

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NEW ENGLAND CENTRAL RAILROAD,)
INC.,)
) Plaintiff,)
) v.) C.A. No. 04-30235 MAP
)
SPRINGFIELD TERMINAL RAILWAY)
COMPANY and BOSTON AND)
MAINE CORPORATION,) Defendants.
)

MOTION TO ALLOW WITHDRAWAL OF COUNSEL

Pursuant to Rule 7(b) of the Rules of Civil Procedure and Rules 7.1 and 83.5.2(c) of this Court, John P. Curtin hereby moves for leave of court to withdraw as counsel for the Defendants in this matter. In support of this motion, Mr. Curtin states that he has left the employ of the Defendants as of January 12, 2007. The matter will continue to be handled by lead counsel(s) Eric L. Hirschhorn and Robert B. Culliford.

Pursuant to Rule 7.1(A)(2) of the Rules of this Court, counsel hereby certifies that he has attempted to confer with counsel for the Plaintiff regarding the filing of this motion.

Dated: January 15, 2007

Respectfully submitted,

/s/ John P. Curtin
John P. Curtin (BBO# 653933)
14 Aviation Avenue
Portsmouth, NH 03801
Tel. 603-766-2006
jcurtin@bmairways.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 15, 2007.

/s/ John P. Curtin
John P. Curtin